

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE: Kenny Velazquez</b>	)	<b>Chapter 13</b>
<b>Debtor</b>	)	<b>Case No. 1:18-bk-01402</b>
	)	
<b>Americredit Financial Services, Inc.,</b>	)	
<b>dba GM Financial</b>	)	
	)	
<b>Kenny Velazquez</b>	)	
<b>Camile Rivera-Torres</b>	)	
<b>Respondent</b>	)	
<b>Charles DeHart, III, Trustee</b>	)	

**DEBTORS' RESPONSE TO MOTION OF AMERICREDIT FINANCIAL SERVICES,  
INC. dba GM FINANCIAL MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

1. Movant, Americredit Financial Services, Inc., dba GM Financial filed its Motion for Relief from Stay on October 11, 2018.
2. Debtor acknowledges some auto payments are past due.
3. Debtor desires the opportunity to pay the auto through his chapter 13 plan and keep his vehicle.
4. Debtor requests the Court deny Movant's Motion for Relief.

WHEREFORE, Debtor, Kenny Velazquez, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed October 11, 2018 by Americredit Financial Services Inc. dba GM Financial.

Dated: October 25, 2018

Respectfully Submitted,

/s/Stephen Wade Parker  
Stephen Wade Parker (315606)  
Counsel for Debtors  
Mooney & Associates  
2 S. Hanover Street  
Carlisle, PA 17013  
Swp@mooney4law.com  
(717) 243-4770 Phone  
(717) 632-3612 Fax